

STATE OF NORTH CAROLINA

File No.

2020-CVS

DURHAM

County

In The General Court Of Justice
☐ District ☒ Superior Court Division

Name And Address Of Plaintiff 1

Alexis Abdul Raheem

3300 Shannon Road

Apt 11E

Durham

NC

27707

Name And Address Of Plaintiff 2

NOV 23 P 4:07

DURHAM CO., C.S.C.

FILED

GENERAL

CIVIL ACTION COVER SHEET

☒ INITIAL FILING ☐ SUBSEQUENT FILING

Rule 5(b) of the General Rules of Practice for the Superior and District Courts

VERSUS

Name And Address Of Defendant 1

DAL Global Services, LLC & Delta Airlines, Inc.

2625 Glenwood Avenue

Suite 550

Raleigh

NC

27608

Summons Submitted

☒ Yes ☐ No

Name And Address Of Defendant 2

Argenbright, Inc.

160 Mine Lake Court

Suite 200

Raleigh

NC

27615

Summons Submitted

☒ Yes ☐ No

Name And Address Of Attorney Or Party, If Not Represented
 (complete for initial appearance or change of address)

Alesha S. Brown

725 E. Trade Street

Suite 115

Charlotte

NC

28202

Telephone No.

704-993-6825

Cellular Telephone No.

(704) 935-2656

NC Attorney Bar No.

53000

Attorney Email Address

abrown@halldixonlaw.com

☒ Initial Appearance in Case ☐ Change of Address

Name Of Firm

Hall and Dixon, PLLC

Fax No.

704-626-2620

Counsel For

☒ All Plaintiffs ☐ All Defendants ☐ Only: (list party(ies) represented)

☒ Jury Demanded In Pleading ☐ Complex Litigation ☐ Stipulate to Arbitration

TYPE OF PLEADING

(check all that apply)

- ☐ Amend (AMND)
- ☐ Amended Answer/Reply (AMND-Response)
- ☐ Amended Complaint (AMND)
- ☐ Assess Costs (COST)
- ☐ Answer/Reply (ANSW-Response) (see Note)
- ☐ Change Venue (CHVN)
- ☒ Complaint (COMP)
- ☐ Confession Of Judgment (CNFJ)
- ☐ Consent Order (CONS)
- ☐ Consolidate (CNLS)
- ☐ Contempt (CNTN)
- ☐ Continue (CNTN)
- ☐ Compel (CMPL)
- ☐ Counterclaim (CTCL) Assess Court Costs
- ☐ Crossclaim (list on back) (CRSS) Assess Court Costs
- ☐ Dismiss (DISM) Assess Court Costs
- ☐ Exempt/Waive Mediation (EXMD)
- ☐ Extend Statute Of Limitations, Rule 9 (ESOL)
- ☐ Extend Time For Complaint (EXCO)
- ☐ Failure To Join Necessary Party (FJNP)

- ☐ Failure To State A Claim (FASC)
- ☐ Implementation Of Wage Withholding In Non-IV-D Cases (OTHR)
- ☐ Improper Venue/Division (IMVN)
- ☐ Including Attorney's Fees (ATTY)
- ☐ Intervene (INTR)
- ☐ Interplead (OTHR)
- ☐ Lack Of Jurisdiction (Person) (LJPN)
- ☐ Lack Of Jurisdiction (Subject Matter) (LJSM)
- ☐ Modification Of Child Support In IV-D Actions (MSUP)
- ☐ Notice Of Dismissal With Or Without Prejudice (VOLD)
- ☐ Petition To Sue As Indigent (OTHR)
- ☐ Rule 12 Motion In Lieu Of Answer (MDLA)
- ☐ Sanctions (SANC)
- ☐ Set Aside (OTHR)
- ☐ Show Cause (SHOW)
- ☐ Transfer (TRFR)
- ☐ Third Party Complaint (list Third Party Defendants on back) (TPCL)
- ☐ Vacate/Modify Judgment (VCMD)
- ☐ Withdraw As Counsel (WDCN)
- ☐ Other (specify and list each separately)

NOTE: All filings in civil actions shall include as the first page of the filing a cover sheet summarizing the critical elements of the filing in a format prescribed by the Administrative Office of the Courts, and the Clerk of Superior Court shall require a party to refile a filing which does not include the required cover sheet. For subsequent filings in civil actions, the filing party must include either a General Civil (AOC-CV-751), Motion (AOC-CV-752), or Court Action (AOC-CV-753) cover sheet.

EXHIBIT A

CLAIMS FOR RELIEF

- | | | |
|--|--|---|
| <input type="checkbox"/> Administrative Appeal (ADMA) | <input type="checkbox"/> Limited Driving Privilege - Out-Of-State Convictions (PLDP) | <input type="checkbox"/> Product Liability (PROD) |
| <input type="checkbox"/> Appointment Of Receiver (APRC) | <input type="checkbox"/> Medical Malpractice (MDML) | <input type="checkbox"/> Real Property (RLPR) |
| <input type="checkbox"/> Attachment/Garnishment (ATTC) | <input type="checkbox"/> Minor Settlement (MSTL) | <input type="checkbox"/> Specific Performance (SPPR) |
| <input type="checkbox"/> Claim And Delivery (CLMD) | <input type="checkbox"/> Money Owed (MNYO) | <input type="checkbox"/> Other (specify and list each separately) |
| <input type="checkbox"/> Collection On Account (ACCT) | <input type="checkbox"/> Negligence - Motor Vehicle (MVNG) | Retaliation and Discrimination |
| <input type="checkbox"/> Condemnation (CNDM) | <input checked="" type="checkbox"/> Negligence - Other (NEGO) | |
| <input type="checkbox"/> Contract (CNTR) | <input type="checkbox"/> Motor Vehicle Lien G.S. Chapter 44A (MVLN) | |
| <input type="checkbox"/> Discovery Scheduling Order (DSCH) | <input type="checkbox"/> Possession Of Personal Property (POPP) | |
| <input type="checkbox"/> Injunction (INJU) | | |

Date

10/26/2020

Signature Of Attorney/Party

[Signature]

FEES IN G.S. 7A-308 APPLY

Assert Right Of Access (ARAS)
Substitution Of Trustee (Judicial Foreclosure) (RSOT)
Supplemental Procedures (SUPR)

PRO HAC VICE FEES APPLY

Motion For Out-Of-State Attorney To Appear In NC Courts In A Civil Or Criminal Matter (Out-Of-State Attorney/Pro Hac Vice Fee)

No. ☐ Additional Plaintiff(s)

No. ☐ Additional Defendant(s) ☐ Third Party Defendant(s)

Summons
Submitted

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

Plaintiff(s) Against Whom Counterclaim Asserted

Defendant(s) Against Whom Crossclaim Asserted

DURHAM

County

In The General Court Of Justice
☐ District ☒ Superior Court Division

Name Of Plaintiff

Alexis Abdul Raheem

FILED

Address

3300 Shannon Road

City, State, Zip

Durham

NC 27707

CIVIL SUMMONS

☐ ALIAS AND PLURIES SUMMONS (ASSESS FEE)

VERSUS

DURHAM CO. C.S.C.

G.S. 1A-1, Rules 3 and 4

Name Of Defendant(s)

DAL Global Services, LLC and Delta Airlines, Inc. BY: *84*

Date Original Summons Issued

10/26/2020

Argenrbright, Inc.

Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1

DAL Global Services and Delta Airlines

2625 Glenwood Avenue

Suite 550

Raleigh

NC 27608

Name And Address Of Defendant 2

Argenrbright, Inc.

160 Mine Lake Court

Suite 200

Raleigh

NC 27615



IMPORTANT! You have been sued! These papers are legal documents, DO NOT throw these papers out! You have to respond within 30 days. You may want to talk with a lawyer about your case as soon as possible, and, if needed, speak with someone who reads English and can translate these papers!

¡IMPORTANTE! ¡Se ha entablado un proceso civil en su contra! Estos papeles son documentos legales. ¡NO TIRE estos papeles!

Tiene que contestar a más tardar en 30 días. ¡Puede querer consultar con un abogado lo antes posible acerca de su caso y, de ser necesario, hablar con alguien que lea inglés y que pueda traducir estos documentos!

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)

Alesha S. Brown

725 E. Trade Street

Suite 115

Charlotte

NC 28202

Date Issued

10/26/2020

Time

4:06

☐ AM ☒ PM

Signature

Terry A. Perry

☒ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court☐ ENDORSEMENT (ASSESS FEE)

This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement

Time

☐ AM ☐ PM

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE TO PARTIES: Many counties have **MANDATORY ARBITRATION** programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

(Over)

RETURN OF SERVICE

I certify that this Summons and a copy of the complaint were received and served as follows:

DEFENDANT 1

Date Served	Time Served <div style="display: flex; justify-content: space-around;"><input type="checkbox"/> AM <input type="checkbox"/> PM</div>	Name Of Defendant
-------------	---	-------------------

- ☐ By delivering to the defendant named above a copy of the summons and complaint.
- ☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- ☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

☐ Other manner of service (specify)

☐ Defendant WAS NOT served for the following reason:

DEFENDANT 2

Date Served	Time Served <div style="display: flex; justify-content: space-around;"><input type="checkbox"/> AM <input type="checkbox"/> PM</div>	Name Of Defendant
-------------	---	-------------------

- ☐ By delivering to the defendant named above a copy of the summons and complaint.
- ☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- ☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

☐ Other manner of service (specify)

☐ Defendant WAS NOT served for the following reason:

Service Fee Paid \$	Signature Of Deputy Sheriff Making Return
Date Received	Name Of Sheriff (type or print)
Date Of Return	County Of Sheriff

STATE OF NORTH CAROLINA
COUNTY OF DURHAM

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
2020-CVS-_____

ALEXIS ABDUL-RAHEEM

Plaintiff,

DURHAM CO., G.S.C.

vs.

BY

[Signature]

DAL Global Services, LLC d/b/a DELTA
GLOBAL SERVICES, DELTA
AIRLINES, INC. and ARGENBRIGHT,
INC.,

Defendants.

COMPLAINT
(JURY TRIAL DEMANDED)

NOW COMES PLAINTIFF, Alexis Abdul-Raheem ("Plaintiff") by and through undersigned counsel, complaining of the Defendants DAL Global Services, LLC, Delta Airlines, Inc. and Argenbright, Inc. (collectively "Defendants") as follows:

PARTIES

1. Plaintiff Alexis Abdul-Raheem is a citizen and resident of Durham County, North Carolina.
2. Upon information and belief, Defendant DAL Global Services, LLC is a foreign Corporation, which, at all times relevant hereto, was authorized to and did conduct business in Durham County, North Carolina. Upon information and belief, Defendant DAL Global Services, LLC is jointly owned by Defendants Delta Airlines, Inc. and Argenbright, Inc.
3. Upon information and belief, Defendant Delta Airlines, Inc. is a foreign Corporation, which, at all times relevant hereto, was authorized to and did conduct business in Durham County, North Carolina. Upon information and belief, Defendant DAL Global Services,

LLC is jointly owned by Defendants Delta Airlines, Inc. and Argenbright, Inc.

4. Upon information and belief, Defendant Argenbright, Inc. is a foreign Corporation, which, at all times relevant hereto, was authorized to and did conduct business in Durham County, North Carolina. Upon information and belief, Defendant DAL Global Services, LLC is jointly owned by Defendants Delta Airlines, Inc. and Argenbright, Inc.

JURISDICTION AND VENUE

5. This Court has personal jurisdiction over Defendants pursuant to N.C. Gen. Stat. § 1-75.4 as Defendants, upon information and belief, is a resident of Durham County, North Carolina.

6. This Court has subject matter jurisdiction over Defendants, in that the acts and omissions of Defendants occurred in Durham County, North Carolina. The amount in controversy is in excess of \$25,000.00.

7. Venue is proper in this Court pursuant to N.C. Gen. Stat. § 1-79 and/or § 1-80. Plaintiff resides in Durham County, North Carolina. Upon information and belief, Defendants is a resident of Durham County, North Carolina.

FACTUAL ALLEGATIONS

8. In July 2018, Plaintiff was hired as an agent by Defendant DAL Global Services, LLC. Her duties and responsibilities included cleaning and preparing aircrafts for Delta Airlines.

9. In early April 2019, Plaintiff began reaching out to Human Resources (HR) to make a number of verbal and written complaints about workplace safety, hostile work environment, discrimination¹ and retaliation.

¹ An EEOC charge has already been filed to address religious, sex and race discrimination. However, to date, the EEOC has not issued a right to sue letter.

10. Shortly after Defendants began to retaliate against Plaintiff in various ways, including harassing Plaintiff, physically assaulting her (pulling at her shirt and bra, making her bra rip), calling her inappropriate names, denying her requests for a change in schedule even though Defendants were aware of Plaintiff's complaints and granted Plaintiff's colleagues' schedule changes.

11. Plaintiff was told that changing bid schedules was based on seniority, but people who were hired after her received better schedules than Plaintiff.

12. Anytime Plaintiff would make a complaint about unsafe workplace conditions, supervisors would fabricate stories about Plaintiff to get her in trouble. For instance, on June 6, 2019, Plaintiff had to leave work early because she was sick after having been on a plane that was not safe and that caused her to have to seek medical care and treatment.

13. Plaintiff notified multiple supervisors about her illness and that she needed to leave work early to seek medical care. After Plaintiff left, she received an email from Defendants' employee, Crystal Turner, asking for a call about Plaintiff "leaving without proper authorization this morning."

14. Plaintiff responded to Ms. Turner's email to explain that what had been reported was untrue and to explain what had actually occurred and noted the complaints Plaintiff had previously made about an aircraft she was working on being so hot it was unsafe (per the aircraft mechanics).

15. When Plaintiff became aware that supervisors were fabricating stories about her in retaliation for her complaints regarding workplace conditions, Plaintiff sent an email detailing what had occurred to Michael James who works in Defendants' Human Resources Department

and asked for help.

16. Plaintiff never received a response from Defendants' Human Resource Department.

17. On July 24, 2019, Plaintiff sustained an injury on the job and was out of work due to restrictions imposed by her doctor. However, despite having a doctor's note, Plaintiff was told she still had to report her absence every shift. Plaintiff complied.

18. During Plaintiff's time out due to the injury, Plaintiff received a notification from Crystal Turner that she had to complete a required training.

19. Plaintiff wanted to return back to work. As such, she went in to complete the training but was unable to do so because she could not log into her work account. She notified her supervisors of this issue and requested help.

20. When Plaintiff went to complete the training, Plaintiff was further harassed and humiliated by the managers on duty. Defendants' supervisors and employees called Plaintiff inappropriate names and stated that her prior complaint of a back injury was the reason why she was in the employment position she was in.

21. On August 22, 2019, Plaintiff emailed Crystal Turner and Michael James to let them know her medical restrictions had been lifted and she would be returning to work and did not want to be harassed or have any issues.

22. When Plaintiff returned in September 2019, all employees submitted a bid for new schedules. Once the schedules came out, Plaintiff realized she did not receive any of the days she bid on and that people who had worked for Defendants less than 90 days had received schedules she requested.

23. Additionally, Plaintiff requested a schedule change so she would not have to work

with the managers who were discriminating, assaulting, harassing, humiliating, and retaliating against her.

24. After making complaints, Plaintiff was also overlooked for a promotion to team lead position, a position she was well-qualified for and had already been performing duties required by the position.

25. Plaintiff consistently reached out to Human Resources and management about schedule issues but was ignored until her case manager for my Workers Compensation claim sent Defendants a message. Importantly, no one from Defendants' Human Resources Department or management team ever addressed the schedule issue.

26. Instead of addressing the retaliation and harassment Plaintiff complained of, Crystal Turner sent Plaintiff another email requiring her to take a mandatory training course that she had already tried to take but was unable to do so because she was not allowed access to Defendants' system after her medical leave. Prior to sending the email, Turner knew Plaintiff was experiencing access issues and had previously attempted to take the course.

27. Because the retaliation and harassment Plaintiff experienced and reported was blatantly ignored by Defendants, Plaintiff's attorney sent counsel for Defendants an e-mail detailing the retaliation, assault, hostility, discrimination and harassment Plaintiff experienced as an employee and, again, requested a schedule change.

28. Defendants responded to Plaintiff's counsel by advising that in order for Plaintiff to receive a schedule change, Plaintiff would have to contact Crystal Turner, one of the managers who was aware of everything that occurred and who was also engaging in the discriminatory and retaliatory behavior.

29. Crystal Turner was copied on the email to Plaintiff's counsel. Instead of addressing the issue regarding a schedule change to alleviate some of the harassment Plaintiff experienced, on the next day, Crystal Turner sent Plaintiff an email regarding attendance concerns, even though she knew Plaintiff was out of work due to her work-related injury and because Plaintiff could no longer endure the harassment, bullying, assault, discrimination and retaliation from the supervisors Plaintiff would be working with had she worked according to the schedule she was assigned.

30. Had Defendants responded to Plaintiff's request for a schedule change, Plaintiff could, and would, have returned back to work.

31. Defendants retaliating, harassing and discriminating against Plaintiff due to her making complaints about work conditions and the work-related injury she sustained was unlawful.

32. Shockingly, even after counsel was involved, Defendants' supervisors and employees continued to harass Plaintiff by calling her to ask what had occurred and engaging in other passive aggressive actions against Plaintiff.

33. Defendants did nothing about the various complaints of harassment and retaliation made by Plaintiff to management and Human Resources. As such, the retaliation continued to occur even after legal became involved. Plaintiff was constantly called offensive names by supervisors, ignored by Human Resources, and treated differently than co-workers far less senior than her in obtaining a work schedule that would work well for her and her children.

34. Unfortunately, Plaintiff suffered a miscarriage due to the stress from the work-place conditions she endured while working for Defendants.

35. Accordingly, on March 20, 2020, Plaintiff filed a Discrimination Complaint with the North Carolina Department of Labor.

36. On July 27, 2020, Plaintiff received a right-to-sue letter from the North Carolina Department of Labor.

37. Plaintiff files this instant lawsuit within the 90-day time frame required by N.C. Gen. Stat. §95-243.

FIRST CAUSE OF ACTION
(Violation of North Carolina's Retaliatory Employment Discrimination Act)

38. Plaintiff reiterates and realleges each and every paragraph above as set forth fully herein.

39. Pursuant to North Carolina's Retaliatory Employment Discrimination Act ("REDA"), no person shall discriminate or take any retaliatory action against an employee for filing, or threatening to file, a complaint about work-place conditions.

40. REDA also prohibits retaliation and discrimination against an employee who files a Workers Compensation Complaint.

41. Plaintiff made multiple good-faith complaints to Defendants' management and Human Resources Department regarding Defendants' unsafe work conditions and the hostility, harassment, discrimination and retaliation Plaintiff endured during her employment.

42. Plaintiff's Workers Compensation claim was filed in good faith after she was injured during her employment with Defendants.

43. Defendants violated REDA because they harassed, discriminated and retaliated against Plaintiff because she made complaints of work-place conditions and after she filed her good-faith Workers Compensation claim.

44. At all times relevant, Defendants were notified on multiple occasions about the issues Plaintiff experienced and willfully ignored Plaintiff's complaint about her schedule and

having to work with the supervisors who ignored the work-place conditions complained of and who willfully discriminated against, retaliated against, harassed, humiliated, and bullied Plaintiff.

45. Plaintiff suffered an adverse employment action when she was not given a schedule she requested and was overlooked for promotion for team lead, even though, upon information and belief, colleagues less senior than her received requested schedules and promotions. Plaintiff also suffered an adverse employment action when she was continuously subjected to bullying, being called inappropriate names, being humiliated in front of her colleagues, being physically assaulted by a supervisor and more.

46. The discrimination, retaliation, harassment, humiliation and bullying Plaintiff endured while being employed by Defendants is the actual and proximate cause of Plaintiff's ongoing physical, emotional and mental injuries. Importantly, Plaintiff suffered a miscarriage due to the stress from the work-place conditions she endured while working for Defendants.

47. Because Defendants' actions were willful, Plaintiff is entitled to treble damages.

SECOND CAUSE OF ACTION
(Negligent Hiring, Supervision, and Retention)

48. Plaintiff reiterates and realleges each and every paragraph above as set forth fully herein.

49. Upon information and belief, Defendants were aware of the discriminatory and retaliatory actions of their supervisors, Human Resource Department and employees that caused Plaintiff's ongoing injuries.

50. However, Defendants employed, and continued to employ, such employees, and was, well aware they could not perform their job duties without engaging in unlawful and discriminatory and retaliatory practices.

51. At all times relevant, Defendants were aware of their employees' incompetence and failures, but has failed to take any action to remedy such incompetence of many of its employees.

52. Defendants' prior and ongoing negligent hiring, supervision and retention of incompetent employees has, and continues to proximately cause Plaintiff's severe physical, emotional and mental harm and anguish.

53. As such, Plaintiff is entitled to and seek damages, including but not limited to, compensatory damages, for her past and current harm due to Defendants' negligence.

54. Because Defendants were, and remains, aware of their employees' incompetence with resolving issues involving unlawful and discriminatory treatment of Plaintiff, Defendants' failure to remedy such dangers constitutes willful and wanton disregard for Plaintiff's rights under North Carolina common law, and therefore, such actions are contrary to the State's public policy and interest. As such, Plaintiff seeks and is entitled to punitive damages from Defendants to the maximum extent allowed pursuant to North Carolina General Statute, Chapter 1D.

THIRD CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)

55. Plaintiff reiterates and realleges each and every paragraph above as set forth fully herein.

56. The constant willful bullying, harassment, being called inappropriate names, and physical assault Plaintiff endured while employed by Defendants all constitute extreme and outrageous conduct that went beyond all possible bounds of decency.

57. At all times, the constant bullying, harassment, being called inappropriate names, and physical assault Plaintiff endured while employed by Defendants was intended to cause

Plaintiff severe emotional distress, and did in fact, cause Plaintiff's ongoing severe emotional distress (e.g. a miscarriage, lack of sleep, concern regarding income, and more).

58. Further, ignoring Plaintiff's multiple requests to change her schedule so she could avoid such extreme and outrageous conduct was also intended to cause Plaintiff severe emotional distress, and did in fact, cause Plaintiff's ongoing severe emotional distress (e.g. a miscarriage, lack of sleep, concern regarding income, and more).

59. Because Defendants' actions were a willful and wanton disregard for Plaintiff's rights under North Carolina law, such actions are contrary to the State's public policy and interest. As such, Plaintiff seeks and is entitled to punitive damages from Defendants to the maximum extent allowed pursuant to North Carolina General Statute, Chapter 1D.

JURY DEMAND

Plaintiff demands that all matters not suitable for determination by this Honorable Court be determined by a jury of his peers.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays the Court for the following:

1. An order entering judgment in favor of Plaintiff in an amount to be determined at trial for each Cause of Action herein;
2. An order awarding Plaintiff actual and compensatory damages against Defendants;
3. An award of punitive damages against Defendants, as allowed by Chapter 1D of the North Carolina General Statutes;

4. An award of treble damages for Defendants' willful violation of North Carolina's Retaliatory Employment Discrimination Act;

5. All costs and expenses in this action, including reasonable attorney's fees from Defendants; and

6. Any and all further relief this Court deems necessary and proper.

This the 26th day of October 2020

HALL & DIXON, PLLC



Alesha S. Brown, NC Bar # 53000
Hall and Dixon, PLLC
725 East Trade Street, Suite 115
Charlotte, NC, 28202
P: (704) 935-2656
F: (704) 626-2620

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing **COMPLAINT** delivered to each of the below listed person(s) this date by placing the same in an official depository under the exclusive care and custody of the United States Postal Service addressed as follows:

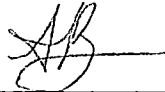
**DAL Global Services, LLC
2625 Glenwood Avenue, Suite 550
Raleigh, NC 27608**

**Delta Airlines, Inc.
2625 Glenwood Avenue, Suite 550
Raleigh, NC 27608**

**Argenbright, Inc.
160 Mine Lake Court, Suite 200
Raleigh, NC 27615**

This the 26th day of October 2020

HALL & DIXON, PLLC



Alesha S. Brown, NC Bar # 53000
Hall and Dixon, PLLC
725 East Trade Street, Suite 115
Charlotte, NC, 28202
P: (704) 935-2656
F: (704) 626-2620

Hail and Dixon, PLLC
725 East Trade Street Suite 115
Charlotte, NC, 28202

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CHARLOTTE, NC
28204
OCT 30, 20
R2304M111438-09

27608

VERIFIED

DAL. Hail and Dixon, PLLC
725 E. Trade St. Suite 115
Charlotte, NC 28202